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PARALEGALS

JUSTIN M. REILLY, ESQ.

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HEATHER N. BABIONE, ESQ.

ROSA COSCIA

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April 24, 2018

**VIA: ECF Filing**

Honorable Debra C. Freeman  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**RE: *Pilkington v. Tutor Perini Building Corp. et al.*; 17 CV 00060 (DCF)**

Dear Magistrate Judge Freeman:

My office represents the Plaintiff in the above-referenced matter. Kindly accept this letter correspondence as Plaintiff's status report regarding the Court's April 19, 2018 So-Ordered Memo Endorsement [D.E. 36].

Plaintiff's counsel conferred with all counsel for the parties in a good faith effort to confirm specific dates for all remaining depositions and to agree upon a joint modified scheduling order for submission to the Court by today's deadline. All counsel for the parties were able to confirm and agree upon specific dates for the remaining depositions in the matter, in addition to the deadlines for fact discovery and expert discovery. However, Defendants' counsel suggested an additional change to the latest version of the parties' proposed joint revised scheduling order late this afternoon, to which counsel for Third-Party Defendant Gilston needs to consent.

Accordingly, Plaintiff respectfully requests an extension of time to file the parties' proposed joint revised scheduling order to April 25, 2018.

We thank the Court its time and attention to this matter.

Respectfully submitted,

Heather N. Babione

cc: All Counsel of Record (VIA ECF Filing)